

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:  
FIRST GUARANTY MORTGAGE  
CORPORATION, *et al.*,<sup>1</sup>  
  
Debtors.

Chapter 11

Case No. 22-10584 (CTG)

(Jointly Administered)

**Hearing Date: January 26, 2023 at 3:00 p.m.**

**Objection Deadline: January 19, 2023 at 4:00 p.m.**

**NOTICE OF FEE APPLICATION**

PLEASE TAKE NOTICE that on January 4, 2023, Dentons US LLP (“DUS”), as counsel for the above-captioned debtors and debtors in possession (the “Debtors”) filed and served the *Fifth Monthly and Final Fee Application of Dentons US LLP, for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred as Counsel to the Debtors for the Period of November 1, 2022 Through November 6, 2022 and the Final Period from June 30, 2022 Through November 6, 2022* (the “Application”) seeking (i) compensation for the reasonable and necessary services rendered to the Debtors in the amount of \$111,104.00 (80% of \$138,880.00) for the reasonable and necessary legal services DUS rendered to the Debtors during the period of November 1, 2022 through November 6, 2022 (the “November Monthly Period”) and \$0.00 (100%) for reimbursement of actual and necessary expenses incurred during the November Monthly Period for a total of \$111,104.00 for the November Monthly Period, and (ii) allowance of compensation on a final basis of \$4,423,841.00 for the reasonable and necessary legal services DUS rendered to the Debtors during for the period of June 30, 2022 through November

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number in the jurisdiction are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The location of the corporate headquarters and the service address for First Guaranty Mortgage Corporation is 5800 Tennyson Parkway, Suite 450, Plano, TX 75024.

6, 2022 (the “Final Fee Period”) and \$39,190.80 for reimbursement of actual and necessary expenses incurred during the Final Fee Period for a total of \$4,463,031.80 for the Final Fee Period.

A copy of the Application is attached hereto.

PLEASE TAKE FURTHER NOTICE that the Application is submitted pursuant to the *Order (I) Approving Procedures for (A) Interim Compensation and Reimbursement of Expenses of Retained Professionals and (B) Expense Reimbursement for Official Committee Members and (II) Granting Related Relief* [D.I. 268] entered on August 2, 2022 [D.I. 268] (the “Administrative Order”).

PLEASE TAKE FURTHER NOTICE that objections or responses to the Application, if any, must be made in writing and filed with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801 (the “Court”), on or before **January 19, 2023, at 4:00 p.m. Prevailing Eastern Time.**

PLEASE TAKE FURTHER NOTICE that at the same time, you must also serve a copy of the response or objection upon: (i) counsel for the Debtors: (a) Dentons US LLP, 601 S. Figueroa Street, #2500, Los Angeles, CA 90017 (Attn: Tania M. Moyron, [tania.moyron@dentons.com](mailto:tania.moyron@dentons.com), and Samuel Maizel, [samuel.maizel@dentons.com](mailto:samuel.maizel@dentons.com)) and (b) Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, Wilmington, Delaware 19801 (Attn: Laura Davis Jones, [ljones@pszjlaw.com](mailto:ljones@pszjlaw.com)); (ii) Barclays Bank PLC: Hunton Andrews Kurth LLP, 200 Park Avenue, New York, NY 10166 (Attn: Peter S. Partee, [ppartee@huntonak.com](mailto:ppartee@huntonak.com)) and (Brian M. Clarke, [brianclarke@huntonak.com](mailto:brianclarke@huntonak.com)); and Potter Anderson & Corroon LLP, 1313 N. Market Street, 6th Floor, Wilmington, Delaware, 19801 (Attn. Jeremy W Ryan, [jryan@potteranderson.com](mailto:jryan@potteranderson.com)); (iii) counsel to LVS II SPE XXXIV LLC, Greenberg Traurig, LLP., (Attn: Nancy Peterman, [PetermanN@gtlaw.com](mailto:PetermanN@gtlaw.com)), (John D. Elrod, [ElrodJ@gtlaw.com](mailto:ElrodJ@gtlaw.com)), (Joseph Davis

DavisJ@gtlaw.com), and (Danny Duerdoth, duerdothD@gtlaw.com); (iv) the Office of the United States Trustee, 844 King Street, Suite 2207 Lockbox 35, Wilmington, DE 19801, (Attn: Benjamin Hackman benjamim.a.hackman@usdoj.gov); and (v) counsel for the Official Committee of Unsecured Creditors, (a) Thompson Coburn Hahn & Hessen LLP, 488 Madison Avenue, New York, NY 10022 (Attn: Mark S. Indelicato mindelicato@thompsoncoburn.com), (Mark T. Power mpower@thompsoncoburn.com) and (Joseph Orbach jorbach@thompsoncoburn.com); and (b) Blank Rome LLP, 1201 Market Street, Suite 800, Wilmington, DE 19801 (Attn: Regina Stango Kelbon, regina.kelbon@blankrome.com), (Victoria A. Guilfoyle, tori.guilfoyle@blankrome.com) and (Lorenzo R. Thomas III, Lorenzo.thomas@blankrome.com).

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS ARE FILED AND SERVED IN ACCORDANCE WITH THE ABOVE PROCEDURES, THEN THE RELIEF REQUESTED IN THE APPLICATION MAY BE PAID WITHOUT FURTHER HEARING.

IF A TIMELY OBJECTION IS FILED AND SERVED, THEN PAYMENT WILL BE MADE ACCORDING TO THE PROCEDURES SET FORTH IN THE ADMINISTRATIVE ORDER. A HEARING ON THE APPLICATION WILL BE HELD ON **JANUARY 26, 2023 AT 3:00 P.M.** BEFORE THE HONORABLE CRAIG T. GOLDBLATT AT THE U.S. BANKRUPTCY COURT, 824 NORTH MARKET STREET, 3<sup>RD</sup> FLOOR, COURTROOM NO. 7, WILMINGTON, DELAWARE, 19801.

Dated: January 4, 2023

**PACHULSKI STANG ZIEHL & JONES LLP**

/s/ Laura Davis Jones

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-and-

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